

May 15, 2019

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street, SW
Washington, DC 20554

**Re: *Wireless Internet Service Providers Association and Utilities Technology Council Request
for Waiver of Citizens Broadband Radio Service Transition Deadline, WT Docket No. 18-353***

Dear Ms. Dortch,

On May 13, 2019, Jennifer McCarthy of Federated Wireless, Inc. (Federated Wireless); Nicole Tupman of Midcontinent Communications (Midco); Moti Elmaliach, Yishai Amsterdamer, Chris Daniels, and Nick Dewar of Telrad Networks Ltd. (Telrad); and Renee Gregory, counsel to NCTA – The Internet & Television Association (NCTA) met separately with Erin McGrath, legal advisor to Commissioner O’Rielly, and Julius Knapp, Aspasia Paroutsas, Rashmi Doshi (by phone), Robert Pavlak, and Navid Golshahi of the Office of Engineering and Technology. On May 14, 2019, Ms. McCarthy, Ms. Tupman, Mr. Daniels, and Ms. Gregory met separately with Will Adams, legal advisor to Commissioner Carr, and Umair Javed, legal advisor to Commissioner Rosenworcel.

In each meeting the participants discussed the likely delay of the Commission’s final equipment authorization of high-power customer premise equipment (CPE) that is likely to affect the ability of fixed wireless operators to participate in Citizens Broadband Radio Service (CBRS) Initial Commercial Deployment (ICD). The participants urged the Commission to consider streamlined options to address the issue in advance of ICD, and prior to final certification. Midco used the attached presentation as a guide for its discussion in the meetings.

In each meeting the participants also referenced NCTA’s and Federated Wireless’ previous filings in this docket asking the Commission to deny the request for blanket waiver of the CBRS transition deadline, but stating that if equipment availability and other concerns have not been resolved in sufficient time for compliance with the existing grandfathering deadline, it may be appropriate for

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individual licensees to request relief based on their specific circumstances.¹

Please address any questions regarding the foregoing to the undersigned.

Sincerely,

/s/ Renee R. Gregory

Renee R. Gregory
Counsel to NCTA

CC: Erin McGrath
Will Adams
Umair Javed
Julius Knapp
Aspasia Paroutsas
Rashmi Doshi
Robert Pavlak
Navid Golshahi

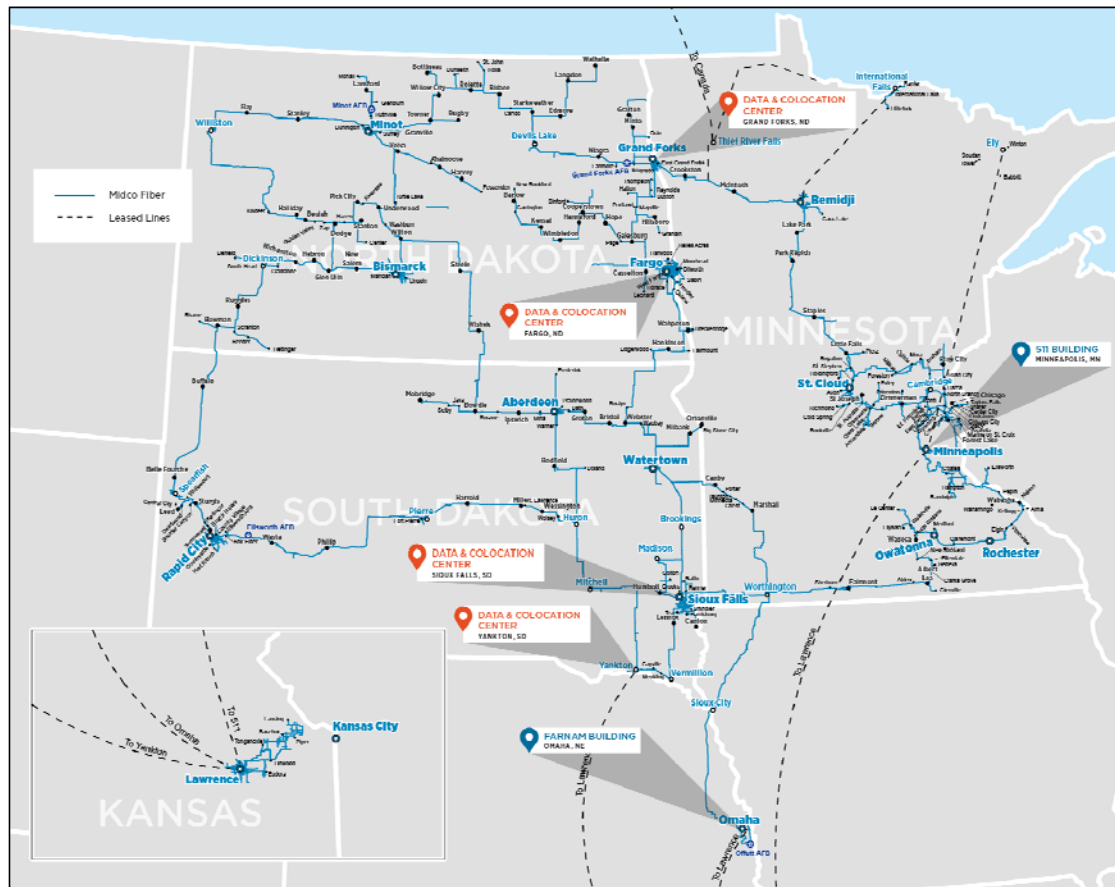
Attachment

¹ See Comments of NCTA – The Internet & Television Association (Dec. 12, 2018); Comments of Federated Wireless, Inc. (Dec. 12, 2018); Letter from Neal M. Goldberg, General Counsel, NCTA, to Marlene H. Dortch, Secretary, FCC (Feb. 22, 2019).

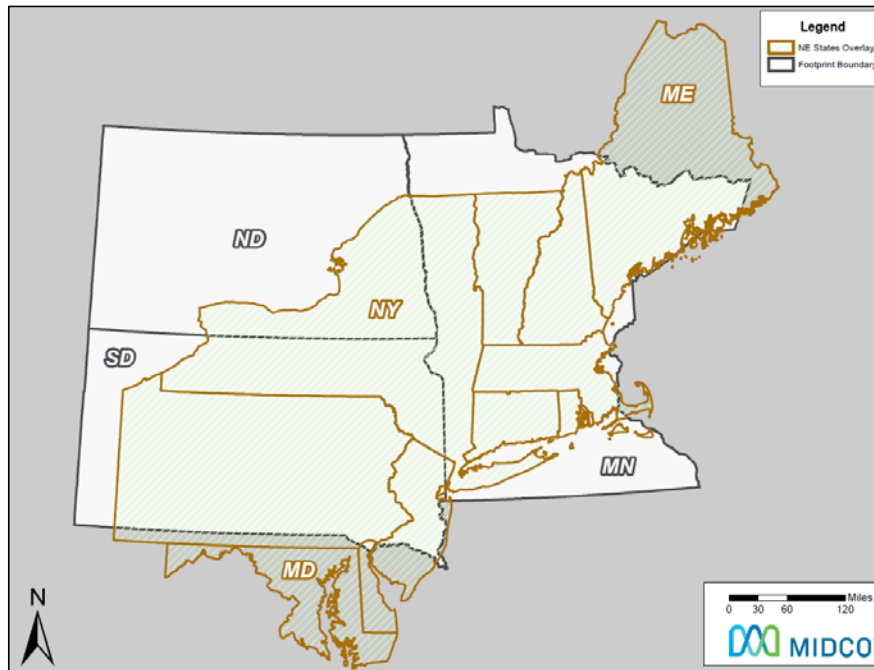
Certifying High-Powered CPEs to Propel Use of the CBRS Band



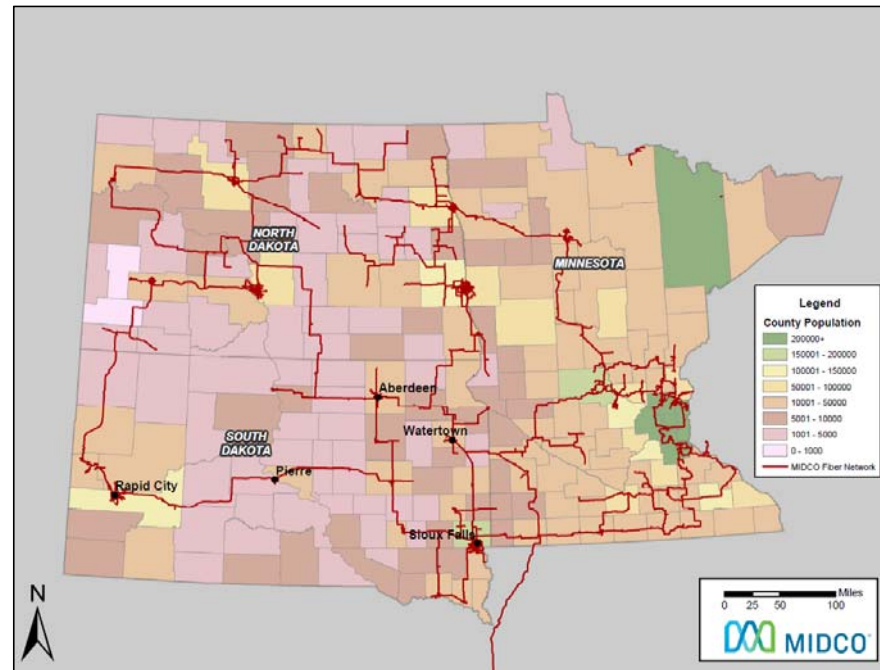
Current Midco Service Area



Midco Serves Rural America



- Northeast: approx. 61.2 million people
- Midco footprint: approx. 7.2 million people



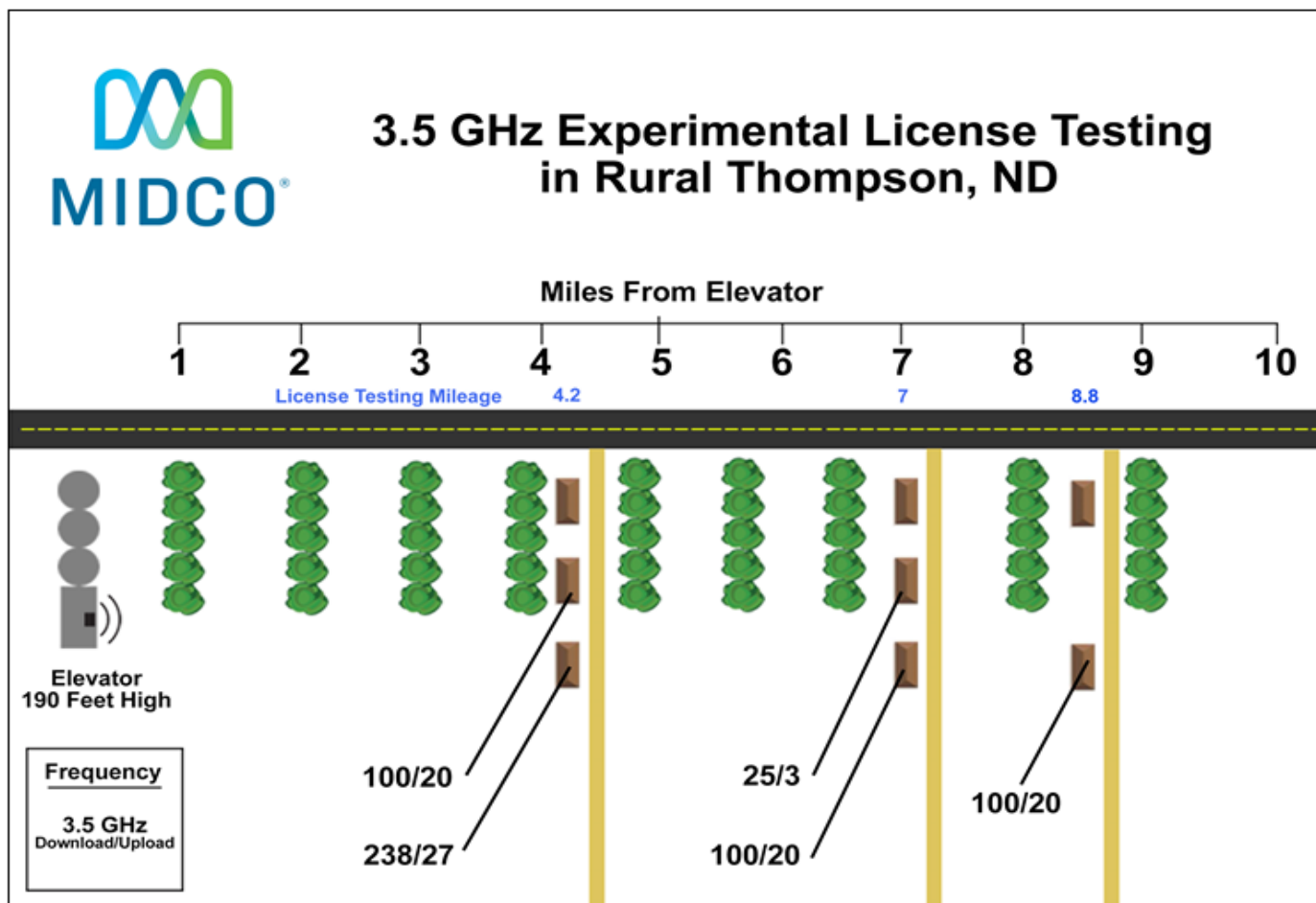
- Half of the counties in the Dakotas have fewer than 5,000 people

Long-time Proponent of CBRS

- Dec. 2009 - Nationwide 3.65 GHz license granted
- Early 2018 - Experimental 3.5 GHz license granted
- Spring 2018 - Started experimental 3.5 GHz testing
- Aug. 2018 - Filed comments supporting county-sized PALs and no SAS opt-out
- Feb. 2019 - Market trial application granted
- Apr. 2019 - Started market trial testing
- Apr. 29, 2019 - Announced successful SAS testing



CBRS Allows for a Significant Speed Increase



Accurate ICD & Expeditious Commercial Deployment

- Concern on propagation models in ICD without high-powered Category B CBSDs, i.e., fixed wireless CPEs
 - ICD needs to determine the smallest exclusion zone for highly directional, high-gain fixed wireless antennas to
- Expeditious ICD and commercial deployment to open the band and close the Digital Divide
 - Ex – Midco is ready to turn on 116 sectors, covering approximately 10,000 people today; additional 332 sectors planned for deployment in 2019



Concerns with Certification Timeline & ICD

| Lead: | Activity: | Date Range: |
|-----------|--|---|
| FCC | Finalize CBSD-CBSD Handshake KDB | Assume final by 4/22 |
| Wlnnforum | Creates specifications and test cases: a) Create system specification from KDB (Working Group 1) b) Create test cases to support system specification (Working Group 4) c) Specification review, balloting, issue final Specification d) Specification review, balloting, issue final test cases | Drafts by mid-May Balloted Final by mid-June |
| TCBs | Implement additional test program from test cases: a) Update CBSD submission to include CPE type b) Update test procedures based on test cases defined by Wlnnforum Note: a new test harness version is not required, reducing the complexity of this effort | Mid - late June |
| TCBs | Test CPEs Submit test reports to OET | Early July – early August |
| FCC-OET | Conducts OEM lab tests at FCC lab according to PAG (Pre-Approval Guidance) requirements | Early August – mid August |
| FCC-OET | Issues equipment authorizations *Waiver of PAG process could eliminate ~4 weeks from timeline | Late August – early September* |

CBRS Band Closes More of the Digital Divide

